

December 22, 2011

BY ELECTRONIC FILING

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 Twelfth St., S.W.
Washington, DC 20554

Re: *Notice of Call Center Opening – CG Docket No. 10-51*

Dear Ms. Dortch:

Pursuant to Section 64.604(c)(5)(iii)(N)(2) of the rules of the Federal Communications Commission (“Commission”),¹ Convo Communications, LLC (“Convo”) hereby provide notice to the Federal Communications Commission (“Commission”) and the TRS Fund Administrator of Convo’s intent to open a new video relay service (“VRS”) call center in Fort Wayne, Indiana, at:

3846 New Vision Drive
Ft. Wayne, Indiana 46845

In addition, Convo respectfully requests the Commission to grant Convo a limited waiver of the Commission’s requirement that VRS providers provide notice at least 30 days *prior* to the opening of a new call center. Specifically, Convo requests to be permitted to open its new Fort Wayne call center effective immediately upon Commission grant of this waiver request.

Convo desires to open the new call center immediately to better handle significant increases in call volume as a result of the Commission’s ongoing restructuring of the VRS industry, which has reduced the number of entities offering VRS service to the deaf and hard-of-hearing community. Although Convo will remain in compliance with the Commission’s speed of answer rules² even absent a Commission grant of this waiver request, grant of the waiver will reduce the anticipated pressure on Convo’s communications assistants and enable Convo to better serve its thousands of deaf and hard-of-hearing customers as Convo adjusts to the anticipated increase in VRS traffic levels. Further, grant of this waiver request will not undermine the Commission’s policy rationale for requiring VRS providers to provide notice

¹ See 47 C.F.R. § 64.604(c)(5)(iii)(N)(2).

² See 47 C.F.R. § 64.604(b)(2)(iii).



Because we understand.

of the opening of a new call center. This notice provides the Commission with the “critical information that will facilitate oversight”³ by the Commission of Convo’s operations. Accordingly, Convo believes that grant of the waiver is supported by good cause and is consistent with the public interest.⁴

Please do not hesitate to contact the undersigned regarding this matter.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "David Bahar", with a long horizontal flourish extending to the right.

David Bahar
*Vice President of Government and
Regulatory Affairs*
Convo Communications, LLC

cc: Rolka Loube Saltzer Associates, LLC

³ See *Structure and Practices of the Video Relay Service Program*, Report and Order and Further Notice of Proposed Rulemaking, CG Docket No. 10-51, 26 FCC Rcd 5545, 5554 (2011).

⁴ See 47 C.F.R. § 1.3 (“Any provision of the rules may be waived by the Commission on its own motion or on petition if good cause therefor is shown”).